

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
NECA-IBEW HEALTH & WELFARE FUND,	:	Civil Action No. 1:08-cv-10783-MGC
Individually and On Behalf of All Others	:	
Similarly Situated,	:	"ECF Case"
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	DECLARATION OF LUCAS F. OLTS IN
	:	SUPPORT OF PLAINTIFF'S MOTION FOR
GOLDMAN, SACHS & CO., et al.,	:	CLASS CERTIFICATION AND
	:	APPOINTMENT OF CLASS
Defendants.	:	REPRESENTATIVE AND CLASS
_____	X	COUNSEL

**[REDACTED PURSUANT TO STIPULATION AND
PROTECTIVE ORDER DATED JULY 10, 2014, DKT. NO. 175]**

I, LUCAS F. OLTS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, counsel of record for Plaintiff in the above-entitled action. I am admitted to appear *pro hac vice* in this action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Expert Report of Joseph R. Mason, dated March 23, 2015 [**Filed under seal**];
- Exhibit 2: Relevant Excerpts from GS Mortgage Securities Corp.'s Form S-3/A, Registration Statement under the Securities Act of 1933, filed with the Securities & Exchange Commission on Jan. 31, 2007;
- Exhibit 3: Relevant Excerpts from the deposition transcript of Michelle Gill, taken on Feb. 12, 2015 in *NECA-IBEW Health & Welfare Fund v. Goldman Sachs & Co.*, No. 08-10783 (S.D.N.Y.) [**Filed under seal**];
- Exhibit 4: Firm Résumé of Robbins Geller Rudman & Dowd LLP;
- Exhibit 5: Relevant excerpt from Goldman Sachs's Organization chart for North America Mortgages [GS NECA 000668936] [**Filed under seal**]; and
- Exhibit 6: Relevant excerpts from May 23, 2007 email from John Cassidy to Michelle Gill attaching Counterparty Approval and Asset Due Diligence report, August 2006 [GS NECA 000666865, Gill Depo. Ex. 3] [**Filed under seal**].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of March, 2015, at San Diego, California.

s/ LUCAS F. OLTS

LUCAS F. OLTS

CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 23, 2015.

s/ LUCAS F. OLTS

LUCAS F. OLTS

ROBBINS GELLER RUDMAN & DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
E-mail: lolts@rgrdlaw.com

Mailing Information for a Case 1:08-cv-10783-MGC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Matthew I. Alpert**
malpert@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Jennifer Nunez Caringal**
jcaringal@rgrdlaw.com,karenc@rgrdlaw.com
- **Joanna Ka Wai Chan**
jchan@cohengresser.com,managingclerksoffice@cohengresser.com
- **Susannah R Conn**
sconn@rgrdlaw.com
- **Courtland W. Creekmore**
ccreekmore@scalaw.com,cdavis@scalaw.com
- **Christopher James Dunne**
dunnec@sullcrom.com,s&cmanagingclerk@sullcrom.com,martelj@sullcrom.com
- **Theodore Edelman**
edelmant@sullcrom.com,holtzmanb@sullcrom.com,pierrej@sullcrom.com,Bellwarej@sullcrom.com
- **Thomas Edward Egler**
tome@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Lawrence Thomas Gresser**
ltgresser@cohengresser.com,managingclerksoffice@cohengresser.com
- **Evan Jay Kaufman**
ekaufman@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Richard Howard Klapper**
klapperr@sullcrom.com,joseph@t@sullcrom.com,Bellwarej@sullcrom.com,gottliebal@sullcrom.com
- **Lawrence Paul Kolker**
kolker@whafh.com
- **Maya Krugman**
krugmanm@sullcrom.com,s&cmanagingclerk@sullcrom.com
- **Angel P. Lau**
alau@rgrdlaw.com
- **Arthur C. Leahy**
artl@rgrdlaw.com

- **Nathan R. Lindell**
nlindell@rgrdlaw.com
- **Ryan A. Llorens**
ryanl@rgrdlaw.com,SBierl@rgrdlaw.com
- **L. Dana Martindale**
dmartindale@rgrdlaw.com
- **Ivy T. Ngo**
ingo@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Lucas F. Olts**
lolts@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **D. Andrew Pietro**
pietroda@sullcrom.com,s&cmanagingclerk@sullcrom.com
- **Nathaniel P. T. Read**
NRead@CohenGresser.com,managingclerksoffice@cohengresser.com
- **David Maxwell Rein**
reind@sullcrom.com,druckj@sullcrom.com,s&cmanagingclerk@sullcrom.com,pierrej@sullcrom.com
- **David Avi Rosenfeld**
drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Patrice Alecia Rouse**
rousep@sullcrom.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Scott H. Saham**
scotts@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Denis Francis Sheils**
dsheils@koh Swift.com
- **Gerald H. Silk**
jerry@blbglaw.com,errol.hall@blbglaw.com,ross@blbglaw.com
- **Susan G. Taylor**
susant@rgrdlaw.com
- **Michael Thomas Tomaino , Jr**
tomainom@sullcrom.com,s&cmanagingclerk@sullcrom.com,pierrej@sullcrom.com,katzmand@rgrdlaw.com
- **Harsh Nayan Trivedi**
s&cmanagingclerk@sullcrom.com,gilmorek@sullcrom.com,trivedih@sullcrom.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)